

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JASON WATSON

**FILED** Case No. **10 CR 0461**  
5-27-10  
MAY 27 2010  
Magistrate Judge Michael T. Mason

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT  
**AFFIDAVIT IN REMOVAL PROCEEDING**

I, LINDA ENGSTROM, personally appearing before United States Magistrate Judge MICHAEL T. MASON and being duly sworn on oath, state that as a federal law enforcement officer I have been informed that JASON WATSON (hereinafter "Watson") has been charged by Complaint in the Western District of New York with the following criminal offenses: knowingly traveling in interstate commerce for the purpose of engaging in sexually explicit conduct with an individual who has not attained the age of 18, in violation of Title 18, United States Code, Section 2423(b) and using the mail and other interstate facilities to persuade, induce, entice and coerce an individual who has not attained the age of 18 to engage in sexually explicit conduct, in violation of Title 18, United States Code, Section 2422(b).

A copy of the Complaint is attached. I have been informed through official channels that a warrant for the arrest of Watson has been issued pursuant to the Complaint. A copy of the arrest warrant also is attached.



LINDA ENGSTROM  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 27th day of May, 2010.



MICHAEL T. MASON  
United States Magistrate Judge

## UNITED STATES DISTRICT COURT

for the

Western District of New York

United States of America

v.

JASON WATSON

Case No. 10-M-

2086

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer.

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) JASON WATSON

who is accused of an offense or violation based on the following document filed with the court:

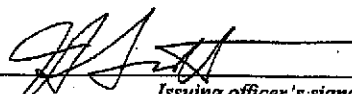
- ☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

Violation of 18 U.S.C. Sections 2423(b) and 2422(b), knowingly traveling in interstate commerce for the purpose of engaging in sexually explicit conduct with an individual who has not attained the age of 18, and using the mail and other interstate facilities to persuade, induce, entice and coerce an individual who has not attained the age of 18 to engage in sexually explicit conduct.

Date: 05/24/2010

3:5 PM



Issuing officer's signature

City and state: Buffalo, New York

HON. HUGH B. SCOTT, U.S. MAGISTRATE JUDGE

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

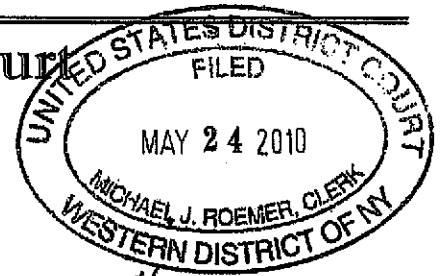
Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

AO 91 (Rev. 02/09) Criminal Complaint

United States District Court  
for the  
Western District of New York



United States of America

v.

JASON WATSON

*Defendant*

Case No. 10-M-

2086

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about the date of January 1, 2009 and on or about March 15, 2009, in the county of Erie in the Western District of New York, and elsewhere, the defendant violated 18 U.S.C. §§ 2423(b) and 2422(b), offenses described as follows:

knowingly traveling in interstate commerce for the purpose of engaging in sexually explicit conduct with an individual who has not attained the age of 18, and using the mail and other interstate facilities to persuade, induce, entice and coerce an individual who has not attained the age of 18 to engage in sexually explicit conduct.

This criminal complaint is based on these facts:

☒ **XX** Continued on the attached sheet.

A handwritten signature in black ink, appearing to read "Eric R. Marburger".

*Complainant's signature*

ERIC R. MARBURGER  
Special Agent, Federal Bureau of Investigation

*Printed name and title*

Sworn to before me and signed in my presence.

Date: May 24, 2010

A handwritten signature in black ink, appearing to read "Hugh B. Scott".

*Judge's signature*

City and State: Buffalo, New York

HONORABLE HUGH B. SCOTT  
United States Magistrate Judge

*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK                    )  
COUNTY OF ERIE                    )     SS:  
CITY OF BUFFALO                    )

I, Eric R. Marburger, being duly sworn, deposes and says:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since December, 1997. I am currently assigned to the Buffalo Field Office Innocent Images National Initiative, which targets individuals involved in the on-line sexual exploitation of children. As part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423.

2. I make this affidavit in support of a criminal complaint charging JASON WATSON with violating Title 18, United States Code, Sections 2423(b) and 2422(b). The statements contained in this affidavit are based on my involvement in this investigation, as well as information provided to me by other law enforcement officers involved in this investigation, and upon my training and experience as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of seeking a criminal

complaint, I have not included each and every fact known to me concerning this investigation.

3. Title 18, United States Code, Section 2423(b) makes it a federal crime to travel in interstate commerce for the purpose of engaging in any illicit sexual conduct with another person.

Title 18, United States Code, Section 2422(b) makes it a federal crime to use the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense.

4. In January, 2009, JASON WATSON began a long distance relationship with a Fifteen year old, Minor Female Victim (hereinafter referred to as MFV), via telephone, text messaging, e-mail and mail. WATSON initially met MFV in late, 2008, when she was dating WATSON's teenage son, who resides in Western New York.

5. Between January, 2009 and March, 2009, WATSON and MFV talked or exchanged text messages almost every day. During the course of these exchanges, WATSON told MFV that she was beautiful

and that he loved her. Some of the text messages WATSON sent to MFV were sexually graphic. For example, in some instances WATSON told MFV that he "wanted to be inside her." WATSON and MFV also talked and texted about having sexual intercourse.

6. During the course of this relationship, WATSON sent MFV gifts and asked her to send him pictures of herself. Several of the pictures WATSON received were of MFV wearing lingerie and some pictured MFV naked. After receiving such photos, WATSON continued to ask MFV to send him photos of herself, in hopes that she would send him additional naked pictures.

7. On Friday, March 13, 2009, WATSON flew from Chicago, Illinois to Buffalo, New York. Once in Buffalo WATSON rented a vehicle and drove to his son's High School in Hamburg, New York. WATSON met with his son's guidance counselor and then, after school, picked up MFV from the vicinity of her high school and drove her to the Hilton Garden Inn, a hotel near the Buffalo-Niagara International Airport.

8. WATSON spent Friday night (March 13, 2009), Saturday and Saturday night (March 14, 2009) with MFV, during which time he took her shopping, out to eat and provided her with vodka. During the course of those two days, Watson and MFV engaged in

oral sex and vaginal sexual intercourse. On Sunday, March 15, 2009 WATSON checked out of the hotel and drove MFV to her parents' house in Western New York.

9. On April 28, 2010, WATSON was interviewed by SA Linda Engstrom of the FBI. During this conversation, WATSON admitted to traveling to Western New York in March, 2009, and to engaging in oral sex and vaginal sexual intercourse with MFV. WATSON also admitted to corresponding with MFV between January, 2009, and March, 2009, through phone, text message, e-mail, and mail, and that he received nude and semi-nude photographs of MFV during that time, and encouraged her to send additional photographs to him.

10. Based on the above information, there is probable cause to believe that JASON WATSON knowingly traveled in interstate commerce for the purpose of engaging in sexually explicit conduct, that sexually explicit conduct being oral and vaginal sexual intercourse, with an individual who had not attained the age of 18, in violation of Title 18, United States Code, Section 2423(b). Additionally, there is probable cause to believe that WATSON used the mail and other interstate facilities to persuade, induce, entice and coerce an individual who had not



attained the age of 18 to engage in sexually explicit conduct, in violation of Title 18, United States Code, Section 2422(b).



Eric R. Marburger  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
24<sup>th</sup> day of May, 2010



Hugh B. Scott  
United State Magistrate Judge